

FILED
 6/1/2022 3:10 PM
 IRIS Y. MARTINEZ
 CIRCUIT CLERK
 COOK COUNTY, IL
 2022L004890
 Calendar, T
 18119080

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
 COUNTY DEPARTMENT, LAW DIVISION**

GEORGE HOBBS, a/k/a Gene Hobbs)	
)	
Plaintiff,)	2022L004890
)	No.
v.)	
)	
KERASOTES THEATERS, INC. a Delaware Corporation,)	Amount Claimed: In Excess of \$50,000.00 DEMAND TO BE HEARD BY A JURY OF TWELVE
Defendant,)	

COMPLAINT AT LAW

NOW COMES Plaintiff, GEORGE HOBBS, a/k/a Gene Hobbs, by and through his attorneys, GORDON LAW OFFICES, LTD., for his complaint at law against Defendant, KERASOTES THEATERS, INC., a Delaware Corporation, state as follows:

NATURE OF THE ACTION

1. Plaintiff brings this action against his former employer, Defendant KERASOTES THEATERS, INC., on the basis of age discrimination in violation of the Illinois Human Rights Act, 775 ILCS 5/2, and Age Discrimination in Employment Act, 29 U.S.C. § 631.

FACTUAL BACKGROUND

2. At all relevant times, Plaintiff resided in Rockford, Winnebago, Illinois.

3. At all times relevant, Defendant was incorporated in Delaware, with its principal place of business in Chicago, Cook County, Illinois.

4. At all times relevant, Defendant was responsible for the acts and/or omissions of its employees.

5. Plaintiff was employed by Defendant from March 5, 1987 until August 7, 2020.

6. Plaintiff was terminated on August 7, 2020.

**EXHIBIT
 A**

7. During his employment Plaintiff performed his job duties satisfactorily.

8. During his employment, Plaintiff was promoted to the position of Regional Manager, overseeing theaters in multiple states, including Illinois.

9. Plaintiff's performance was as good as that of his co-workers, and he was never disciplined or reprimanded.

10. Plaintiff was 55 years old at the time of the discharge.

COUNT I
Age Discrimination in Violation of Illinois Human Rights Act

11. Plaintiff realleges and incorporates paragraphs 1-10 of this Complaint, as if fully set forth herein.

12. Upon information and belief, when Defendant terminated Plaintiff, it was done so on the basis of Plaintiff's age.

13. Defendant, by its acts and omissions, discriminated against Plaintiff on the basis of his age in violation of the Illinois Human Rights Act, 775 ILCS 5/2.

14. As a proximate result of the foregoing act and/or omissions, Plaintiff has suffered actual and punitive damages, including, but not limited to, lost wages, incidental damages, pain and suffering in the form of emotional distress, anxiety, embarrassment and humiliation, and attorneys' fees and costs.

WHEREFORE, Plaintiff, GEORGE HOBBS, a/k/a Gene Hobbs, demands judgment against Defendant, KERASOTES THEATERS, INC., a Delaware Corporation, in an amount in excess of \$50,000.00, plus attorneys' fees and costs and any other damages allowed pursuant to the Illinois Human Rights Act.

COUNT II

Age Discrimination in Violation of the Age Discrimination in Employment Act

15. Plaintiff realleges and incorporates paragraphs 1-10 of this Complaint, as if fully set forth herein.

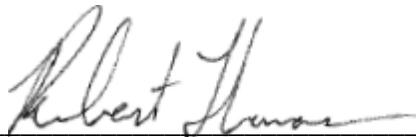
16. Upon information and belief, when Defendant terminated Plaintiff, it was done so on the basis of Plaintiff's age.

17. Defendant, by its acts and omissions, discriminated against Plaintiff on the basis of his age in violation of the Age Discrimination in Employment Act, 29 U.S.C. § 631.

18. As a proximate result of the foregoing act and/or omissions, Plaintiff has suffered actual and punitive damages, including, but not limited to, lost wages, incidental damages, pain and suffering in the form of emotional distress, anxiety, embarrassment and humiliation, and attorneys' fees and costs.

WHEREFORE, Plaintiff, GEORGE HOBBS, a/k/a Gene Hobbs, demands judgment against Defendant, KERASOTES THEATERS, INC., a Delaware Corporation, in an amount in excess of \$50,000.00, plus attorneys' fees and costs and any other damages allowed pursuant to the Age Discrimination in Employment Act

Respectfully submitted,
GEORGE "Gene" HOBBS

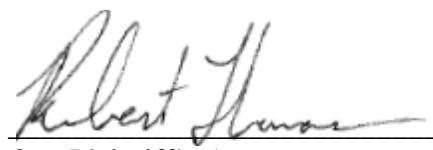
By: 

One of His Attorneys

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Tod Rottman
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312-332-5200
Atty #: 57507
Attorneys for Plaintiff

AFFIDAVIT

I, Robert Thomas, one of the attorneys for the Plaintiff, GEORGE HOBBS, being under oath, hereby state under penalty of perjury and penalties as provided pursuant to 735 ILCS 5/1-109, I certify that the statements set forth herein in the Complaint are true and correct, except as to matters therein stated to be on information and belief and as to such matters I certify as aforesaid that I verily believe the same to be true.



One Plaintiff's Attorneys

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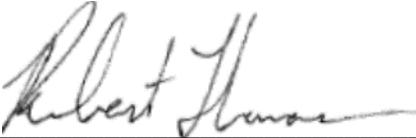
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AFFIDAVIT

I, Robert Thomas, first being duly sworn on oath, depose and state as follows:

1. The damages claimed by the Plaintiff exceed the sum of FIFTY THOUSAND DOLLARS (\$50,000.00).

FURTHER AFFIANT SAYETH NOT.



Robert Thomas
Attorney for Plaintiff

VERIFICATION

Under penalties as provided by law pursuant to 735 ILCS 5/1-109 of the Code of Civil Procedure, the undersigned certifies that the statements set forth in this instrument are true and correct, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that he/she verily believes the same to be true.



Robert Thomas